

UNITED STATES DISTRICT COURT  
for the  
Southern District of California

N.Z., R.M., B.L., S.M., and A.L., )  
individually and on behalf of themselves )  
and all others similarly situated, )  
\_\_\_\_\_  
*Plaintiff(s)* )  
v. )  
FENIX INTERNATIONAL LIMITED, FENIX INTERNET LLC, )  
BOSS BADDIES LLC, MOXY MANAGEMENT, UNRULY )  
AGENCY LLC (also d/b/a DYSRPT AGENCY), BEHAVE )  
AGENCY LLC, A.S.H. AGENCY, CONTENT X, INC., VERGE )  
AGENCY, INC., AND ELITE CREATORS LLC, )  
\_\_\_\_\_  
*Defendant(s)* )  
\_\_\_\_\_  
)

Civil Action No. 8:24-cv-01655-FWS-SSC

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* FENIX INTERNATIONAL LIMITED  
9th Floor, 107 Cheapside  
London, EC2V 6DN  
United Kingdom

(See Attachment A)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Christopher R. Pitoun (SBN 290235)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 N. Lake Avenue, Suite 920  
Pasadena, California 91101  
Telephone: (213) 330-7150; Facsimile: (213) 330-7152  
Email: christopherp@hbsslaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Brian D. Karth  
CLERK OF COURT

Date: August 2, 2024

/s/ *Jennylam*  
Signature of Clerk or Deputy Clerk



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Civil Action No. 8:24-cv-01655-FWS-SSC

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_,  
a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

1 Christopher R. Pitoun (SBN 290235)  
2 HAGENS BERMAN SOBOL SHAPIRO LLP  
3 301 N. Lake Avenue, Suite 920  
4 Pasadena, California 91101  
5 Telephone: (213) 330-7150  
Facsimile: (213) 330-7152  
Email: christopherp@hbsslaw.com

6 Robert B. Carey (*pro hac vice forthcoming*)  
7 Michella A. Kras (*pro hac vice forthcoming*)  
8 HAGENS BERMAN SOBOL SHAPIRO LLP  
9 11 West Jefferson, Suite 1000  
Phoenix, Arizona 85003  
10 Telephone: (602) 840-5900  
Facsimile: (602) 840-3012  
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michellak@hbsslaw.com

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

17 N.Z., R.M., B.L., S.M., and A.L.,  
18 individually and on behalf of themselves  
and all others similarly situated.

19 Plaintiffs,

20 || v.

21 FENIX INTERNATIONAL LIMITED,  
22 FENIX INTERNET LLC, BOSS  
23 BADDIES LLC, MOXY  
24 MANAGEMENT, UNRULY AGENCY  
25 LLC (also d/b/a DYSRPT AGENCY),  
26 BEHAVE AGENCY LLC, A.S.H.  
AGENCY, CONTENT X, INC., VERGE  
AGENCY, INC., AND ELITE  
CREATORS LLC,

27 Defendants.

Case No.

## **CLASS ACTION COMPLAINT**

## **ACTION SEEKING STATEWIDE OR NATIONWIDE RELIEF**

**DEMAND FOR JURY TRIAL**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

N.Z., et al. v. FENIX INTERNATIONAL LIMITED, et al.  
Case No. 8:24-cv-01655-FWS-SSC

**ATTACHMENT A TO SUMMONS**

**DEFENDANTS TO BE SERVED (CONTINUED):**

FENIX INTERNET LLC  
C/O CASTLE PINES, INC.  
501 Silverside Road, Suite 87  
Wilmington, DE 19809

BOSS BADDIES LLC  
C/O REGISTERED AGENTS INC.  
2800 E Enterprise Avenue, Suite 333  
Appleton, WI 54913-7889

MOXY MANAGEMENT  
C/O ERESIDENTAGENT, INC.  
9000 Sunset Boulevard, Suite 1260  
Los Angeles, CA 90069

UNRULY AGENCY LLC (also d/b/a DYSRPT AGENCY)  
C/O VCORP AGENT SERVICES, INC.  
25 Robert Pitt Drive  
Monsey, NY 10952

BEHAVE AGENCY LLC  
C/O VCORP AGENT SERVICES, INC.  
25 Robert Pitt Drive  
Monsey, NY 10952

A.S.H. AGENCY  
C/O Harold Laufer  
216 S Hamilton Drive, Unit A  
Beverly Hills, CA 90211

CONTENT X, INC.  
C/O Reggie Gooden  
21800 W Oxnard Street, Suite 940  
Woodland Hills, CA 91367

VERGE AGENCY, INC.  
10960 Wilshire Boulevard, 5th Floor  
Los Angeles, CA 90024

ELITE CREATORS LLC  
C/O Andrew Bachman  
205 SE 20th Street,  
Fort Lauderdale, FL 33316